

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ROBERT V. TOWNES, IV,)	
Individually and on behalf of)	
all persons similarly situated,)	
)	
Plaintiff,)	CIVIL ACTION
)	04-1488-JJF
)	
vs.)	
)	
TRANS UNION, LLC, AND)	CLASS ACTION
TRUELINK, INC.,)	
)	
Defendants.)	

DECLARATION OF ROBERT V. TOWNES IV

Pursuant to 28 U.S.C. 1746, I hereby declare the following under penalty of perjury:

1.

I, Robert V. Townes IV, am the named Plaintiff in the above-captioned action. This Declaration is prepared and submitted in support of Plaintiffs' Petition for Approval of Incentive Award for Class Representative, Motion for Final Approval of Class Action Settlement, and Motion for Award of Attorneys' Fees and Expenses, and for any other purpose allowed by law. The statements made herein are based upon my personal knowledge, and I am competent to testify to the statements set forth herein.

2.

In December of 2004, my lawyers filed the Class Action Complaint ("Complaint") in this action in the United States District Court for the District of Delaware. Prior to the Complaint being filed, I discussed with my attorneys my belief that TrueLink, Inc. and/or Transunion LLC had misstated and/or misrepresented certain things regarding the offerings which were sold to me on the website www.truecredit.com, and had failed to comply with certain requirements of the Credit Repair Organizations Act. Specifically, I purchased a 3-in-1 credit report with score from www.truecredit.com, and I believe that the operators of that site violated the CROA by failing to provide me with those disclosures required by the CROA, and by misleading me in connection with my purchase by representing that they would provide me with personalized tips for improving my credit score, but when all I received was generalized credit advice.

3.

Prior to becoming involved in the case, I met with my attorneys and I provided them with information and documents in regard to the offering I purchased and to the statements made on the website. I decided to file this action, and I agreed to serve as a representative of a class of persons who had made similar purchases. It was my belief that the Transunion defendants should be held

accountable for their actions, and I authorized my attorneys to seek class certification in the lawsuit being filed on my behalf.

4.

Since I became involved in the lawsuit, I have consulted with and assisted my attorneys on several occasions to review documents, provide documents, prepare to answer discovery requests, and obtain information for use in the lawsuit. I also participated in person in the mediation before Magistrate Judge Thyng, which required that I travel from my home in Alabama to this Court and required that I be out of town for several days.

5.

I have been advised by my attorneys about the progress of this case and advised about the possibilities of settlement. I have also been advised about the Settlement Agreement reached and the benefits it provides to persons situated similarly to me. I have consulted with my attorneys on a continuing basis throughout the many months following the in-person mediation and have provided input to my lawyers concerning settlement.

6.

My attorneys have explained to me that this case had certain risks due to the fact that it involved difficult and complex legal issues. My attorneys explained the rulings made by other courts which have considered substantially similar cases and

their potential adverse impact on the claims I am asserting in this case. My attorneys advised that continued litigation, including but not limited to a trial, could result in some or all of the class members getting nothing. Based upon those issues, the representations made to me by my attorneys, and my understanding of the settlement, I agree with my attorneys that this case should be settled. I believe that the settlement as set forth in the Settlement Agreement is a fair and reasonable settlement.

7.

I understand that the Transunion defendants have agreed to pay an incentive award to me for my time and effort in serving as a Plaintiff and a Class Representative in this case. I understand that my attorneys are filing a Petition for Approval of Incentive Award for Class Representative seeking to have the Court approve the agreement to compensate me \$7,500.00. I understand that the Court may approve the agreement to compensate me in an amount up to \$7,500.00 for my efforts on behalf of the class. Other than this incentive award payment, I do not want anything from the settlement that other class members are not entitled to receive. My interests are not antagonistic to or in conflict with those of the class. I believe that \$7,500.00 is an appropriate amount to compensate me for my efforts.

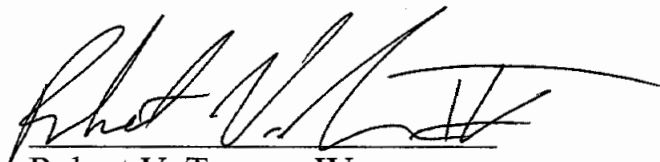
8.

I also understand that the Transunion defendants have agreed not to object to an award of attorneys' fees and reimbursement of expenses in an amount not to exceed \$1,200,000.00. I am aware that my attorneys are filing a Motion for Award of Attorneys' Fees and Expenses seeking \$1,200,000.00. I believe that this amount is fair and appropriate in light of the time and efforts they expended and of the substantial benefits conferred on the class as a result of the settlement of this case. I am personally aware of the efforts of my attorneys in the prosecution of this case.

9.

I understand that this Declaration will be utilized by my attorneys in support of numerous filings and submissions, and I approve that use.

This 16 day of August, 2007.



Robert V. Townes IV

CERTIFICATE OF SERVICE

I, Carmella P. Keener, hereby certify that on this 20th day of August, 2007, I caused the foregoing document to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to the following:

William M. Lafferty, Esquire
Morris, Nichols, Arsht & Tunnell, LLP
1201 N. Market Street
P.O. Box 1347
Wilmington, DE 19899-1347

Christopher J. Curtin, Esquire
Erisman & Curtin
629 Mt. Lebanon Road
Wilmington, DE 19803

/s/ Carmella P. Keener
Carmella P. Keener (DSBA No. 2810)
ROSENTHAL, MONHAIT & GODDESS, P.A.
919 Market Street, Suite 1401
Citizens Bank Building
Wilmington, DE 19899-1070
(302) 656-4433
ckeener@rmgglaw.com

ATTORNEYS FOR PLAINTIFF